

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano,

Plaintiff

V.

The City of Nashua, et al.,

Defendants

Civil Action No. 22-cv-00326-LM

**AFFIDAVIT OF LAURA COLQUHOUN IN OPPOSITION
OF MOTION OF DEFENDANTS BOLTON AND
LEONARD'S MOTION FOR SUMMARY JUDGMENT**

I, Laura Colquhoun, being under oath, do hereby depose and say as follows:

1. Although I am not a party in this action, I am a friend of Laurie Ortolano (“Ortolano”), the plaintiff in this action, and like her I have taken a citizen’s interest in trying to hold the City of Nashua’s government accountable in terms of operating fairly and transparently. I have personal knowledge of the facts stated in this affidavit.

2. On March 15, 2021, pursuant to RSA 91-A, New Hampshire's Right to Know Law, I emailed Mr. David Lavoie, Records Manager of the Nashua Police Department, requesting the

public records of all incidents of Criminal Trespass that have happened at City Hall in Nashua, New Hampshire. These would include all Criminal Trespass where either a verbal, written and/or arrest happened during the period of January 1, 2014 thru January 31, 2021.

3. Mr. Lavoie responded to my request by letter of March 15, 2021 with attached documents. A true, accurate, and complete copy of Mr. Lavoie's response on behalf of the Nashua Police Department is attached hereto as Exhibit "A."

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 4/25/2024
DAY OF APRIL 2024.

Laura Colquhoun
LAURA COLQUHOUN

Joseph Scott LaScola
Notary Public
4/25/24



NASHUA POLICE DEPARTMENT



Chief of Police Michael Carignan
Main Phone: (603) 594-3500
Website: www.nashuapd.com

28 Officer James Roche Drive
Mailing Address: PO Box 785
Nashua, NH 03061-0785

March 15, 2021

To: Laura Colquhoun
30 Greenwood Dr.
Nashua, NH 03062

SUBJECT: Right-to-Know Request regarding City Hall and Criminal Trespass

The Nashua Police Department Records Division received your emailed Right-to-Know request on March 15, 2021 requesting ***copies of all public records of all incidents of Criminal Trespass that have happened at City Hall in Nashua, New Hampshire. These would include all Criminal Trespass where either a verbal, written and/or arrest happened during the period of January 1, 2014 thru January 31, 2021.*** In response, the Nashua Police Department completed several searches to fulfill your request as there are several ways a call can be logged.

- Reports 21-4609-OF and 21-10467-AR surrounding the incident at City Hall on 01/22/2021 and Laurie Ortolano are not included. Both of the reports were provided to you from a previous Right-to-Know request.
- I found no other Incident or Arrest reports involving the charge of Criminal Trespass from 01/01/2014 thru 01/31/2021 that was specific to City Hall as the location of the violation.
- Calls for Service from 01/01/2014 thru 01/31/2021 with a location of City Hall and trespass noted in the call narrative are attached. This will provide how a call was handled (warned, left on request, etc). Completing the search with a call type of "Criminal Trespass" with the location of City Hall yielded no results.

Redactions made to the documentation provided involve any personal and private information (HIPAA) of subjects involved to include, dates of birth, social security numbers, home addresses and phone numbers.

In the event that you have any questions, please contact me at (603) 589-1653.

Sincerely,

A handwritten signature in cursive script that reads "David P. Lavoie".

David P. Lavoie
Records Manager

Lavoie, David

From: Laura Colquhoun <lauracolquhoun2@gmail.com>
Sent: Monday, March 15, 2021 8:15 AM
To: Lavoie, David
Subject: Right To Know Request

RECEIVED

MAR 15 2021

**NASHUA POLICE DEPT
RECORDS DIVISION**

****CAUTION**** this e-mail was received from outside of our organization. Do not click links or open attachments if the source is unknown to you. (npd905)

**30 Greenwood Dr
Nashua, NH 03062
March 15, 2021**

**Mr. David Lavoie
Nashua Police Department
10 Panther Dr.
Nashua, NH 03062**

Dear Mr. Lavoie:

Under the **New Hampshire Right to Know Law R.S.A. Ch. 91-A et seq.**, I am requesting copies of all public records of all incidents of Criminal Trespass that have happened at City Hall in Nashua, New Hampshire. These would include all Criminal Trespass where either a verbal, written and/or arrest happened during the period of January 1, 2014 thru January 31, 2021.

I am requesting this information be sent to me electronically and therefore no fees should be required. This information is not being sought for commercial purposes.

The New Hampshire Right to Know Law requires a response time of five business days. If access to the records I am requesting will take longer than this amount of time, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you can provide the written documentation sooner, that would be appreciated.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Thank you for considering my request.

Sincerely,

Laura Colquhoun

603-402-9339

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Laura Colquhoun

For Date: 12/04/2014 - Thursday

Call Number	Time	Call Reason	Action	Priority
14-92096	1403	Phone - UNDESIRABLE	Transported to Hospital	3
Location/Address: [NAS 764] CITY HALL - 229 MAIN ST Calling Party: CITY HALL HONEYWELL, JASON ID: SENIOR PATROLMAN KEVIN M DELANEY 1451 Disp-14:06:09 Arvd-14:08:14 Clrd-14:27:18 Location Change: [NAS 1227] ELM STREET PKG GARAGE - 12 ELM ST [Modified: 12/04/2014 1410] ID: MASTER PATROLMAN JOSUE I SANTIAGO 1497 Disp-14:06:17 Enrt-14:08:16 Arvd-14:18:15 Clrd-14:27:18 Location Change: [NAS 1227] ELM STREET PKG GARAGE - 12 ELM ST [Modified: 12/04/2014 1410] Narrative: 12/04/2014 1405 intoxicated female was passed out in 1st floor bathrrom male & female left out of rear exit (elm st) - compl wants subj's trespassed from location Female is Dorothy & compl unsure of male's name Narrative: 12/04/2014 1413 dorothy l , ambulance enroute				

For Date: 08/12/2015 - Wednesday

15-56571	1442	Initiated - CHECK CONDITIONS	FOLLOW UP	3
Primary Id: SENIOR PATROLMAN JACLYN M MCIVER 1345 Location/Address: [NAS 764] CITY HALL--ELM ST. SIDE - 229 MAIN ST ID: SENIOR PATROLMAN JACLYN M MCIVER 1345 Arvd-14:42:00 Clrd-14:55:12 ID: 2ND YEAR SPECIAL OFF ADAM M RAYHO 8088 Disp-14:44:11 Arvd-14:50:29 Clrd-18:51:34 Location Change: [NAS 4244] NASHUA POLICE DEPARTMENT - 0 PANTHER DR [Modified: 08/12/2015 1456] Narrative: 08/12/2015 1444 ref: 15-56556-Crimininal Trespass				

For Date: 04/17/2017 - Monday

17-25119	1505	Initiated - SUBJECT STOP	WARNED	3
Location/Address: [NAS 764] CITY HALL - 229 MAIN ST ID: SENIOR PATROLMAN ROBERT M LACERDA 6512 Arvd-15:05:10 Clrd-15:14:48 ID: 2ND YEAR SPECIAL OFF MATTHEW W GIFTOS 1278 Arvd-15:05:47 Clrd-15:14:50 Narrative: 04/17/2017 1513 Eric was trespassed from 7 Star and Main Street Gyro on behalf of management due to his disorderly behavior.				

For Date: 08/23/2017 - Wednesday

17-58088	0900	Phone - UNDESIRABLE	LEFT UPON REQUEST	3
Location/Address: [NAS 764] CITY HALL - 229 MAIN ST Calling Party: EMPLOYEE TURNER, TRACEY LEE LEE Involved Party: SOPHOS, ERIC PAUL Involved Party: MOCHRIE, AMBER BLAIR ID: SENIOR PATROLMAN JASON K REINOLD 6514 Disp-09:04:21 Enrt-09:06:24 Arvd-09:08:27 Clrd-09:27:47 ID: MASTER PATROLMAN-2 SCOTT D CISZEK 1410 Disp-09:04:30 Enrt-09:06:24 Arvd-09:08:26 Clrd-09:27:47				

Narrative: 08/23/2017 0903

male & female going through trash & taking cardboard
w/m named Eric, cammo shirt
w/f, green shorts

Male is now in front of city hall, smoking, talking to self

Narrative: 08/23/2017 0926

eric and amber were trespassed and both left upon request

For Date: 05/02/2018 - Wednesday

18-31346 1352 Phone - UNDESIRABLE LEFT UPON REQUEST 3

Location/Address: [NAS 764] CITY HALL - 229 MAIN ST

Calling Party: DUGAS, ROSS

Involved Party: LAZO, CARLOS

ID: SENIOR PATROLMAN HANNAH R MERULLO 7489

Disp-13:57:13 Enrt-13:57:28 Arvd-14:02:06 Clrd-14:13:47

ID: MASTER PATROLMAN-2 DENNIS P LEE 1479

Disp-13:57:26 Enrt-13:57:28 Arvd-13:58:53 Clrd-14:13:47

ID: MASTER PATROLMAN MICHAEL A YEOMELAKIS 1373

Disp-14:00:56 Arvd-14:00:58 Clrd-14:13:47

Narrative: 05/02/2018 1353

on the main floor in the rotunda next to mv - male in the
men's room, in a stall with the door locked - highly
intoxicated and will not come out

Narrative: 05/02/2018 1419

CARLOS WAS FOUND IN BATHROOM STALL INTOXICATED AND WAS
DRINKING SEVERAL MALT BEVERAGES....PER JENNIFER
DESHAINES....NASHUA RISK MANAGEMENT....LAZO WAS ISSUES A ONE
YEAR TRESPASS FROM CITY HALL AND ITS CURTILAGE. HE WAS
ADVISED THAT IF HE HAD BUSINESS IN CITY HALL TO CONTACT NPD
AND REQUEST A KEEP THE PEACE..

For Date: 05/29/2018 - Tuesday

18-38497 0016 Initiated - SUBJECT STOP WARNED 3

Location/Address: [NAS 764] CITY HALL - 229 MAIN ST

Involved Party: HUARD, CORY

ID: PATROLMAN JONATHAN P TURCOTTE 8460

Arvd-00:16:00 Clrd-00:25:58

Narrative: 05/29/2018 0047

Cory was "on the Nod" sitting on the benches next to City
Hall. Cory was warned about trespassing on the property and
told to leave. Cory was warned for his disorderly behavior
due to him knowingly creating a condition which is hazardous
to himself in a public place by any action that serves no
legitimate purpose.

For Date: 07/23/2019 - Tuesday

19-49067 1403 Phone - DISORDERLY LEFT UPON REQUEST 2

Location/Address: [NAS 764] CITY HALL - 229 MAIN ST

Calling Party: CITY HALL EMPLOYEE

PITCUCH, PATRICIA

Involved Party: WILLIAMS, CHARLES H

ID: SENIOR PATROLMAN HANNAH R MERULLO 7489

Disp-14:04:34 Enrt-14:05:15 Arvd-14:09:04 Clrd-14:23:25

ID: MASTER PATROLMAN ALEXANDER P GANGI 1472

Disp-14:05:13 Enrt-14:05:15 Arvd-14:05:54 Clrd-14:23:25

ID: MASTER PATROLMAN DANIEL P HAYDEN 6887

Arvd-14:05:51 Clrd-14:14:30

Narrative: 07/23/2019 1403

Modified By: 07/23/2019 1404

in city clerks office -
male that was just removed from transit is not in office
yelling at employees about being trespassed from transit
center

Narrative: 07/23/2019 1404

city's clerks office is in rear of city hall -

Narrative: 07/23/2019 1405

subj is Michael Treadwell - b/m, rust color shirt, blue
pants

Narrative: 07/23/2019 1411

William was upset with City Hall about being trespassed from
the Transit Center and spoke to employees who confirmed
this. He was advised to leave the area and did so upon
request. He was not on transit property at this time. Left
upon request.

For Date: 08/29/2019 - Thursday

19-57720 1648 Phone - UNDESIRABLE CALL CANCELLED 3

Location/Address: [NAS 764] CITY HALL - 229 MAIN ST

Calling Party: MCKENNEY, WILLIAM

Narrative: 08/29/2019 1648

community development offices on second floor subject is
refusing to leave

Narrative: 08/29/2019 1650

compl. advised female left and would like call cancelled.
Compl. does not need subj. trespassed or spoken to.

For Date: 05/12/2020 - Tuesday

20-22458 2340 Initiated - SUBJECT STOP ALL OKAY 3

Location/Address: [NAS 764] CITY HALL - 229 MAIN ST

Involved Party: COLCORD, ERIC MICHAEL

Involved Party: PEREIRA, JOHN ANIBAL

ID: PATROLMAN MICHAEL P CASEY 10611

Arvd-23:40:00 Clrd-23:45:35

ID: PATROLMAN JOSEPH C PEACH 10015

Disp-23:40:48 Enrt-23:40:51 Arvd-23:42:52 Clrd-23:45:35

Narrative: 05/13/2020 0044

Johnny and Eric were hanging out behind City Hall. They
stated that they were leaving. Johnny was wearing pants and
a dark hooded sweatshirt and had a bicycle with him. Eric
was wearing jeans and a red jacket.

John was trespassed from the Nashua Telegraph per Heather
Henline and myself from an incident that occurred on March
03. Please reference 20-8628 for further regarding that
incident. All okay.

For Date: 12/28/2020 - Monday

20-65617 1624 Phone - UNDESIRABLE WARNED 3

Location/Address: [NAS 764] CITY HALL - 229 MAIN ST

Calling Party: MIGNEAULT, MICHAEL @ 229 MAIN ST - NASHUA, NH 03060

Involved Party: HOLM, GREGORY A

ID: SENIOR PATROLMAN MATTHEW R FRIEND 8579

ID: Disp-16:27:36 Enrt-16:28:28 Arvd-16:30:59 Clrd-16:38:21
 1ST YR OFC CERT2 KYLE W DONAHUE 11909
 ID: Disp-16:27:36 Enrt-16:28:28 Arvd-16:33:53 Clrd-16:38:21
 SERGEANT ANDREW D LANE 1484
 ID: Disp-16:31:53 Arvd-16:33:50 Clrd-16:38:21

Narrative: 12/28/2020 1625

compl states someone snuck into building acting disorderly right now.

Narrative: 12/28/2020 1625

compl has never seen them before. compl will let officer in side building.

Narrative: 12/28/2020 1626

Modified By: 12/28/2020 1627

the man is demanding to see the mayor and got in compl face.

Narrative: 12/28/2020 1640

Gregory was upset that he had been trespassed from the garage so he went to city hall in hopes to speak with the mayor about the issue. Gregory was unaware that city hall is currently closed and was informed he would need to make an appointment. Gregory left city hall and I attempted to provide him with advice on the situation, however he refused to listen. Lastly Gregory was warned not to enter city hall unless he makes an appointment first due to city hall being closed. WARNED.

For Date: 01/22/2021 - Friday

21-4609 0925 Phone - UNDESIRABLE LEFT UPON REQUEST 2

Primary Id: MASTER PATROLMAN TIMOTHY J ROACH 1481
 Location/Address: [NAS 764] CITY HALL - 229 MAIN ST Apt. #3RD F
 Involved Party: LLOYD, MINDY M
 Involved Party: LEONARD, CELIA
 Involved Party: ORTOLANO, LAURIE A
 ID: MASTER PATROLMAN-2 DENNIS P LEE 1479
 Disp-09:28:03 Enrt-09:29:28 Clrd-09:34:18
 ID: MASTER PATROLMAN MICHAEL A YEOMELAKIS 1373
 Disp-09:28:03 Enrt-09:29:28 Arvd-09:45:17 Clrd-10:03:37
 ID: SERGEANT ANDREW G KARLIS 1311
 Disp-09:29:20 Enrt-09:29:28 Clrd-09:34:13
 ID: SERGEANT CHRISTOPHER D CARON 1480
 Disp-09:29:25 Enrt-09:29:28 Arvd-09:33:51 Clrd-09:54:20
 ID: MASTER PATROLMAN TIMOTHY J ROACH 1481
 Disp-09:29:40 Enrt-09:29:43 Arvd-09:30:34 Clrd-10:03:37

Narrative: 01/22/2021 0926

Modified By: 01/22/2021 0928

3rd floor next to auditorium, requesting Police for a woman that forced her way into their office and will not leave

Narrative: 01/22/2021 0928

Lori Ordolano, purple winter coat, grey backpack- She wants to review documents. she has a lawsuit against the city and was told to speak with an attorney but they are appointment only. She refuses to leave

Narrative: 01/22/2021 0929

woman is sitting in front of the door to their office now. they feel threatened by her presence, no weapons visible

Narrative: 01/22/2021 0957

Modified By: 01/22/2021 1020

Laurie was sat down in an upstairs corridor area of City Hall. Was not causing a scene on arrival and appeared calm. She was upset as reported she has been trying to get appointment and paperwork stamped by city hall and they continue to not assist her. Reports this has been going on for months. She apparently assists people in property tax

abatement/reductions and needed papers stamped.

Spoke with Celia from City Hall who is Deputy Corporation Counsel for city? She said this is ongoing issue with Laurie and that personnel from NPD are aware. No allegations of any threats made but stated that Celia needed to leave now. Wanted her trespassed but allowed at City Hall if she has an approved appointment. Reported the City have had a lot of contact with Laurie via email and that there are pending lawsuits with the City.

Lauries was asked to leave. She left willingly but stressed her frustration indicating that the City do not communicate with her or assist her. She was informed she is being trespassed for one year and is not allowed at City Hall unless with an appointment. She was advised that she could face arrest from Criminal Trespass if she attends City Hall without an appointment. She understood.

No offences alleged or apparent

Refer To Incident: 21-4609-OF